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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

ROGER SINCLAIR WRIGHT, an individual.

Plaintiff,

v.

CHRISTOPHER GREGORIO, in his individual and official capacity as a Seattle Police Department Officer; MICHAEL LARNED, in his individual and official capacity as a Seattle Police Department Officer; MICHAEL BONET, in his individual and official capacity as a Seattle Police Department Officer; ERNEST JENSEN, in his individual and official capacity as a Seattle Police Department Officer; SYLVIA PARKER, in her individual and official capacity as a Seattle Police Department Officer; WILLIAM WALTZ, in his individual and official capacity as a Seattle Police Department Officer; JAMES THOMSEN, in his individual and official capacity as a Seattle Police Department Officer; VASILIOS SIDERIS, in his individual and official capacity as a Seattle Police Department Officer; BRIAN HUNT, in his individual and official capacity as a Seattle Police Department Officer; EVAN EHRING, in his individual and official capacity as a Seattle Police Department Officer; TIMOTHY BRENTON, in his individual and official capacity as a Seattle Police Department Officer; THE CITY OF SEATTLE, a municipal corporation; and DOES 1-10;

Defendants

18 CV 1006 RSM

COMPLAINT FOR DAMAGES

(DEMAND FOR JURY TRIAL)

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3 **I. PRELIMINARY STATEMENT**

4 1. Plaintiff Roger Sinclair Wright is an African-American male who has been
5 physically and mentally abused on multiple occasions by white police officers employed by
6 the Seattle Police Department. These are the type of incidents that later caused the
7 Department of Justice to conclude that the Seattle Police Department “engages in a pattern
8 or practice of unnecessary or excessive force, in violation of the Fourth Amendment to the
9 United States Constitution.” Defendant the City of Seattle has engaged in an on-going,
10 concerted effort to conceal the facts surrounding its abuse of Mr. Wright.

11 **II. PARTIES**

12 2. Plaintiff Roger Sinclair Wright is an adult African-American male. Mr.
13 Wright resides in Renton, Washington, within this judicial district.

14 3. Defendant Michael Bonet is an individual who, upon information and belief,
15 resides in this judicial district. At all times relevant hereto, Defendant Michael Bonet was a
16 police officer with the Seattle Police Department, an employee of the City of Seattle, and
17 was acting within the course and scope of his employment. All acts committed by Defendant
18 Bonet were done under color of the laws of the State of Washington and under the authority
19 of his position as a police officer with the Seattle Police Department.

20 4. Defendant Ernest Jensen is an individual who, upon information and belief,
21 resides in this judicial district. At all times relevant hereto, Defendant Ernest Jensen was a
22 police officer with the Seattle Police Department, an employee of the City of Seattle, and
23 was acting within the course and scope of his employment. All acts committed by Defendant
24 Jensen were done under color of the laws of the State of Washington and under the authority
25 of his position as a police officer with the Seattle Police Department.

26 5. Defendant Sylvia Parker is an individual who, upon information and belief,

1 resides in this judicial district. At all times relevant hereto, Defendant Sylvia Parker was a
2 police officer with the Seattle Police Department, an employee of the City of Seattle, and
3 was acting within the course and scope of her employment. All acts committed by
4 Defendant Parker were done under color of the laws of the State of Washington and under
5 the authority of her position as a police officer with the Seattle Police Department.

6 6. Defendant William Waltz is an individual who, upon information and belief,
7 resides in this judicial district. At all times relevant hereto, Defendant William Waltz was a
8 police officer with the Seattle Police Department, an employee of the City of Seattle, and
9 was acting within the course and scope of his employment. All acts committed by Defendant
10 Waltz were done under color of the laws of the State of Washington and under the authority
11 of his position as a police officer with the Seattle Police Department.

12 7. Defendant James Thomsen is an individual who, upon information and belief,
13 resides in this judicial district. At all times relevant hereto, Defendant James Thomsen was a
14 police officer with the Seattle Police Department, an employee of the City of Seattle, and
15 was acting within the course and scope of his employment. All acts committed by Defendant
16 Thomsen were done under color of the laws of the State of Washington and under the
17 authority of his position as a police officer with the Seattle Police Department.

18 8. Defendant Valsilios Suderis is an individual who, upon information and
19 belief, resides in this judicial district. At all times relevant hereto, Defendant Valsilios
20 Sideris was a police officer with the Seattle Police Department, an employee of the City of
21 Seattle, and was acting within the course and scope of his employment. All acts committed
22 by Defendant Sideris were done under color of the laws of the State of Washington and
23 under the authority of his position as a police officer with the Seattle Police Department.

24 9. Defendant Brian Hunt is an individual who, upon information and belief,
25 resides in this judicial district. At all times relevant hereto, Defendant Brian Hunt was a
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1 police officer with the Seattle Police Department, an employee of the City of Seattle, and
2 was acting within the course and scope of his employment. All acts committed by Defendant
3 Hunt were done under color of the laws of the State of Washington and under the authority
4 of his position as a police officer with the Seattle Police Department.

5 10. Defendant Evan Ehring is an individual who, upon information and belief,
6 resides in this judicial district. At all times relevant hereto, Defendant Evan Ehring was a
7 police officer with the Seattle Police Department, an employee of the City of Seattle, and
8 was acting within the course and scope of his employment. All acts committed by Defendant
9 Ehring were done under color of the laws of the State of Washington and under the authority
10 of his position as a police officer with the Seattle Police Department.

11 11. Defendant Timothy Brenton is an individual who, upon information and
12 belief, resides in this judicial district. At all times relevant hereto, Defendant Timothy
13 Brenton was a police officer with the Seattle Police Department, an employee of the City of
14 Seattle, and was acting within the course and scope of his employment. All acts committed
15 by Defendant Brenton were done under color of the laws of the State of Washington and
16 under the authority of his position as a police officer with the Seattle Police Department.

17 12. Defendant Christopher Gregorio is an individual residing in this judicial
18 district. At all times relevant hereto, Defendant Gregorio was a police officer with the
19 Seattle Police Department, an employee of the City of Seattle, and was acting within the
20 course and scope of his employment. All acts committed by Defendant Gregorio were done
21 under color of the laws of the State of Washington and under the authority of his position as
22 a police officer with the Seattle Police Department.

23 13. Defendant Michael Larned is an individual residing in this judicial district. At
24 all times relevant hereto, Defendant Larned was a police officer with the Seattle Police
25 Department, an employee of the City of Seattle, and was acting within the course and scope
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1 of his employment. All acts committed by Defendant Larned were done under color of the
2 laws of the State of Washington and under the authority of his position as a police officer
3 with the Seattle Police Department.

4 14. Defendant City of Seattle is a governmental entity and a municipal
5 corporation operating in this judicial district. Among its departments is the Seattle Police
6 Department, which is responsible for traditional law enforcement activities within the City
7 of Seattle.

8 15. Plaintiff does not know the true names or capacities of all the law
9 enforcement officers and staff. These Defendants are sued herein under the fictitious names
10 DOES 1 through 10, inclusive. Plaintiff is informed and believes, and on that basis alleges,
11 that DOES 1 through 10 have knowledge and/or notice of the conduct, transactions and/or
12 occurrences that form the basis of Plaintiff's allegations herein, officers, agents and/or
13 employees of Defendants, City of Seattle and/or the City of Seattle Police Department.

14 16. All of the DOE Defendants are sued individually and in their official
15 capacities. All John and Jane DOES are persons or entities who are currently Unidentified
16 Law Enforcement Officer(s), herein identified as DOES until ascertained to Plaintiff, but
17 who may be liable for the damages suffered by the Plaintiff as alleged herein. Plaintiff will
18 amend this Complaint to state their true names and capacities when ascertained. To date,
19 their identities have been concealed by Defendant City of Seattle.

20 **III. JURISDICTION AND VENUE**

21 17. This Court has original jurisdiction over the plaintiff's civil rights claims
22 under 42 U.S.C. § 1983, pursuant to 28 U.S.C. § 1331 (federal question) and 28 U.S.C. §
23 1343 (civil rights) and 28 U.S.C. § 2201. Declaratory relief is authorized under 28 U.S.C. §§
24 2201 and 2202.

25 18. Venue is proper within the Western District of Washington pursuant to 28
26

1 U.S.C. § 1391, because a substantial part of the events or omissions giving rise to Plaintiff's
2 claims occurred in this judicial district.

3 **IV. FACTUAL ALLEGATIONS**

4 19. On October 9, 2004, Mr. Wright was standing in a QFC parking lot near
5 Rainier Ave. S. and S. McClellan street in Seattle, Washington.

6 20. Without warning or explanation, Mr. Wright was approached and attacked,
7 without provocation, by multiple Seattle Police Officers, including Defendants Michael
8 Bonet, Ernest Jensen, Sylvia Parker, William Waltz, and DOES 1-3. Mr. Wright was
9 punched, kicked, kneed, and wrestled to the ground. Mr. Wright was then choked by one of
10 the Seattle Police Officers until he fell unconscious. The Seattle Police Officers said
11 absolutely nothing before attacking Mr. Wright.

12 21. When Mr. Wright regained consciousness, he was standing on the shoulder of
13 the I-90 freeway in Seattle. He was completely naked. Within a few moments of regaining
14 consciousness, Mr. Wright was tazed by the several Seattle Police Officers, including
15 Defendants James Thomsen, Valsilios Sideris, Brian Hunt, Evan Ehring, and Timothy
16 Brenton.

17 22. Mr. Wright was subsequently placed into an ambulance and taken to the
18 hospital for treatment of his injuries. The arresting officers falsely told the responding medic
19 that Mr. Wright had taken the drug PCP. Based on that lie, the physicians at the hospital
20 administered Mr. Wright the anti-psychotic drug Hadol-an. Tests performed at the hospital,
21 however, later confirmed that Mr. Wright had no PCP in his system.

22 23. As a result of Defendants extreme, unconscionable, and excessive use of
23 force, Mr. Wright suffered substantial injury, including but not limited to, emotional distress
24 including PTSD, memory loss, traumatic brain injury, pain and suffering, humiliation, fear
25 of incarceration, anxiety, depression, inability to sleep and loss of consortium.
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1 24. About one week later, Mr. Wright suffered a chaotic episode triggered by the
2 anti-psychotic drug Hadol-an, which he was administered because of the deliberate lies of
3 Defendants, as noted above. Mr. Wright was walking down a public street acting erratically.
4 He was tazed by other unidentified Seattle Police Officers, including DOES 4-5.

5 25. This further exacerbated Mr. Wright's substantial injury, including but not
6 limited to, his PTSD, which he continued to suffer from for over 12 years.

7 26. Defendants continued their pattern of harassing and abusive conduct towards
8 Mr. Wright.

9 27. Mr. Wright was criminally charged and convicted of a crime based on the
10 warrantless stop and search of his automobile by Defendants, on or around November 29,
11 2006.

12 28. After almost six years of legally contesting the conduct of Defendants under
13 color of state law, Mr. Wright finally received confirmation of his constitutional injury on
14 April 5, 2012 when the Washington Supreme Court ruled, in *State v. Wright* (consolidated
15 with *State v. Snapp*), 275 P.3d 289 (Wash. 2012) that Defendants' search of Mr. Wright's
16 vehicle violated his constitutional rights.

17 29. On November 29, 2006, Defendant Seattle police officer Christopher
18 Gregorio was approaching the intersection with South Roxbury Street and Waters Avenue
19 South.

20 30. At 4:45 p.m., as he approached Roxbury, Officer Gregorio saw Mr. Wright
21 driving a car a block away on a parallel street, 59th Avenue South, driving north without his
22 car headlights on.

23 31. Defendant Gregorio proceeded to follow Mr. Wright in his patrol car and
24 later claimed it was for failing to have his headlights turned on even though the law did not
25 require headlights at that time of the day, because he was not legally required to do so since
26

1 less than half an hour had passed since "sunset occurred at 4:21 p.m." and the law did not
2 require that headlights be turned on. Thus, Defendant Gregorio lacked reasonable suspicion
3 or probable cause to stop Mr. Wright for a traffic infraction.

4 32. Defendant Gregorio immediately pulled in behind Mr. Wright's vehicle to
5 stop Mr. Wright, while calling for a backup police officer to respond to the scene at the same
6 time.

7 33. Mr. Wright did not try to evade the stop by Defendant Gregorio and
8 immediately complied stopping his vehicle.

9 34. Defendant Gregorio then approached Mr. Wright, the sole occupant of the
10 car, and demanded his driver's license, registration, and proof of insurance.

11 35. Defendant Gregorio told Mr. Wright that he had stopped him, ostensibly due
12 to Officer Gregorio's generalized concern and subjective belief that the entire area was a
13 "hot spot" for car prowls and burglaries, is the type of generalized search strictly forbidden
14 by the Fourth Amendment, as well as Article I, Section 22 of the Washington Constitution.

15 36. Mr. Wright was handcuffed and placed under arrest for possession of
16 marijuana based on the Defendant Gregorio's claim there was a strong odor of marijuana
17 coming from the car.

18 37. Upon Defendant Gregorio's arrest of Mr. Wright, he passed him off to
19 Defendant Larned, the backup officer who responded to Defendant Gregorio's request for
20 backup shortly after he had initiated contact with Mr. Wright.

21 38. Mr. Wright was placed in the back of a patrol car and questioned by
22 Defendant Gregorio about the purported odor of marijuana in the car. However, at no point
23 did Defendant Gregorio witness Mr. Wright smoking marijuana.

24 39. Mr. Wright was secured in the patrol car at the time the officer proceeded to
25 search the car incident to arrest for evidence of the crime of arrest: possession of marijuana.
26

1 40. In the course of this intrusive search with the aid of a canine (K-9) unit, the
2 officer located marijuana, MDMA, and a scale. During the entirety of this search, Wright
3 was secured in the patrol car, so there was no reasonable threat to officer safety or
4 belief that evidence would be lost or destroyed.

5 41. Mr. Wright was subsequently convicted of two counts of possession of
6 marijuana and MDMA following the denial of his motion to suppress evidence illegally
7 obtained by Defendants' unconstitutional search and seizure of Mr. Wright and his vehicle.
8 After Mr. Wright's direct appeal to the Washington Court of Appeals, his convictions were
9 upheld.

10 42. Plaintiff Roger Wright then filed a motion for reconsideration in light of the
11 United States Supreme Court decision in *Arizona v. Gant*, 556 U.S. 332, 129 S.Ct. 1710, 173
12 L. Ed. 2d 485 (2009). The Court of Appeals again affirmed the trial court's rulings.

13 43. Mr. Wright then filed a petition for discretionary review to the Supreme
14 Court of Washington. Upon which, the Washington Supreme Court specifically invalidated
15 the search of Mr. Wright's vehicle by Defendants as unconstitutional and reversed Mr.
16 Wright's convictions on April 5, 2012; and the Court remanded Mr. Wright's case for
17 further proceedings consistent with its ruling.

18 44. As a result of the Defendants' illegal search and seizure and wrongful
19 conviction thereto, Mr. Wright has suffered substantial injury, including but not limited to,
20 PTSD, memory loss, pain and suffering, humiliation, fear of incarceration, anxiety,
21 depression, inability to sleep and loss of consortium. In short, the Defendants have directly
22 caused the dramatic worsening of Roger Wright's life.

23 45. Mr. Wright suffered and continues to suffer greatly from the stigma and
24 publicity surrounding the occurrence, and the deprivation of Mr. Wright's civil rights that
25 permeated this entire affair.
26

1 46. Mr. Wright previously initiated a civil legal action against Defendants for
2 their unconstitutional conduct. *See Wright v. Gregorio, et. al.*, Cause No. 2:14-cv-00592-
3 MJP (W.D. Wash.) (complaint filed 4/22/14). That action was dismissed *without prejudice*
4 to allow Mr. Wright to re-file this case.

5 6 V. MONELL ALLEGATIONS

7 47. All Defendants and their respective officials, with deliberate indifference to
8 the constitutional rights of persons within its jurisdiction, each respectively maintained or
9 permitted one or more of the following official policies or customs:

- 10 A. Failure to provide adequate training and supervision to law
11 enforcement officers with respect to constitutional limits on legal
12 standards of making stops of vehicles;
- 13 B. Failure to provide adequate training and supervision to law
14 enforcement officers with respect to constitutional limits on legal
15 standards of conducting searches of vehicles;
- 16 C. Failure to provide adequate training and supervision to law
17 enforcement officers to prevent officers from the unconstitutional use
18 of race, ethnicity and color in selecting suspects for investigating and
19 enforcement of the law; i.e., racial profiling.

20 48. Based upon the principles set forth in *Monell v. New York City Dept. of*
21 *Social Services*, 436 U.S. 658, 98 S.Ct. 2018, 56 L.Ed.2d 611 (1978), all Defendants,
22 respectively, are each liable for all injuries sustained by Plaintiff Roger Sinclair Wright as
23 set forth herein. The liability of the Defendants arises from the fact that the Defendants'
24 policies and customs were a direct and legal cause of the damages of Mr. Wright.

25 49. The deliberate indifference to the deprivation of the Plaintiff's rights by the
26 Defendants is so closely and proximately related to injuries suffered by Plaintiff as to be the

1 moving force that caused said injuries, as detailed herein.

2 50. Pursuant to 28 U.S.C. § 1331, upon proof of Defendants' violation of his
3 federal constitutional rights Plaintiff is entitled to, and herein seeks, money damages,
4 including compensatory and punitive damages from Defendants.
5

6 **VI. FIRST CAUSE OF ACTION: EXCESSIVE FORCE (42 U.S.C. § 1983)**

7 51. Plaintiff restates the allegations of the above paragraphs.

8 52. Defendants, acting under color of state law and in concert with one another,
9 stopped, seized, and used unreasonable and unnecessary force on Mr. Wright without
10 justification, in violation of the Fourth Amendment guarantee against unreasonable searches
11 and seizures. Those actions give rise to Plaintiff's claims pursuant to the Fourth
12 Amendment, applicable to the states through the Fourteenth Amendment to the Constitution
13 of the United States, and 42 U.S.C. §1983.

14 53. Defendants' acts were the direct and proximate cause of injury to Plaintiff.
15 They were intentional and done in knowing violation of Plaintiff's legal and constitutional
16 rights, without good faith, and with reckless disregard and/or callous indifference to
17 Plaintiff's civil rights.

18 54. Defendants' conduct interfered with Plaintiff's ability to assert his rights
19 pursuant to the Fourth Amendment of the United States Constitution.

20 55. Pursuant to 28 U.S.C. § 1331, upon proof of Defendants' violation of his
21 federal constitutional rights Plaintiff is entitled to, and herein seeks, money damages,
22 including compensatory and punitive damages from Defendants.
23

24 **VII. SECOND CAUSE OF ACTION: UNREAONABLE SERACH AND SEIZRUE -**
PERSON - (42 U.S.C. § 1983)

25 56. Plaintiff restates the allegations of the above paragraphs.
26

1 57. Defendants, acting under color of state law and in concert with one another,
2 stopped, searched, seized and arrested Mr. Wright without reasonable suspicion or probable
3 cause in violation of the Fourth Amendment guarantee against unreasonable searches and
4 seizures. Those actions give rise to Plaintiff's claims pursuant to the Fourth Amendment,
5 applicable to the states through the Fourteenth Amendment to the Constitution of the United
6 States, and 42 U.S.C. §1983.

7 58. Defendants' acts were the direct and proximate cause of injury to Plaintiff.
8 They were intentional and done in knowing violation of Plaintiff's legal and constitutional
9 rights, without good faith, and with reckless disregard and/or callous indifference to
10 Plaintiff's civil rights.

11 59. Defendants' conduct interfered with Plaintiff's ability to assert his rights
12 pursuant to the Fourth Amendment of the United States Constitution.

13 60. Pursuant to 28 U.S.C. § 1331, upon proof of Defendants' violation of his
14 federal constitutional rights Plaintiff is entitled to, and herein seeks, money damages,
15 including compensatory and punitive damages from Defendants.
16

17 **VIII. THIRD CAUSE OF ACTION: ILLEGAL SEARCH/SEIZURE OF**
18 **PROPERTY – VEHICLE (42 U.S.C. § 1983)**

19 61. Plaintiff restates the allegations of the above paragraphs.

20 62. Officer Gregorio acted or purported to act in the performance of his official
21 duties as an employee of, and under the official policy or custom of, the Seattle Police
22 Department.

23 63. Officer Larned acted or purported to act in the performance of his official
24 duties as an employee of, and under the official policy or custom of, the Seattle Police
25 Department.
26

1 64. Unidentified law enforcement personnel acted or purported to act in the
2 performance of their official duties as employees of, and under the official policy or custom
3 of, their respective law enforcement agency.

4 65. Mr. Wright had a right to be free from an unreasonable search and seizure of
5 his property.

6 66. Defendants Officer Gregorio, Officer Larned and unidentified law
7 enforcement personnel seized Mr. Wright's vehicle and its contents. Defendants placed Mr.
8 Wright into custody and took possession and/or control of Mr. Wright's vehicle. Defendants
9 took possession of its contents in a manner that meaningfully interfered with Mr. Wright's
10 right to possess his property.

11 67. Defendants seized Mr. Wright's vehicle without a warrant authorizing the
12 seizure. No written order, signed by a judge, existed to permit the law enforcement officers
13 to seize Mr. Wright's vehicle or its contents.

14 68. Defendants lacked legal justification to hold and search Mr. Wright's
15 vehicle.

16 69. The acts of Defendants holding and searching Mr. Wright's vehicle, without
17 authority or legal justification, deprived Mr. Wright of his right to property.

18 70. In seizing Mr. Wright's vehicle and its contents, Defendants acted
19 intentionally and/or with deliberate indifference to Mr. Wright's rights.

20 71. The seizure of Mr. Wright's property was unreasonable.

21 72. Defendants deprived Mr. Wright of his property without due process of law.

22 73. At all times relevant hereto, the rights held by Mr. Wright to be free from
23 unreasonable seizure of his property were clearly established. Defendants' actions give rise
24 to Plaintiff's claims pursuant to the Fourth Amendment, applicable to the states through the
25 Fourteenth Amendment to the Constitution of the United States, and 42 U.S.C. §1983.
26

1 74. Upon information and belief, the Seattle Police Department has expressly
2 adopted an official policy or has a longstanding practice or custom regarding traffic stops,
3 vehicle impounds, narcotics investigations, and seizures of property.

4 75. The acts of Defendants resulted in Mr. Wright's injury, including pecuniary
5 and nonpecuniary damages and attorney fees and costs, in amounts to be determined at trial.
6

7 **IX. FOURTH CAUSE OF ACTION: DENIAL OF EQUAL PROTECTION OF**
8 **THE LAWS - RACIAL PROFILING (42 U.S.C. § 1983)**

9 76. Plaintiff restates the allegations of the above paragraphs.

10 77. Defendants, acting under color of law and in concert with one another,
11 engaged in intentional race discrimination. In so doing, Defendants have caused Mr. Wright
12 to suffer deprivations of his fundamental rights to liberty and to be free from unlawful
13 searches and seizures on account of his race. These actions violated Plaintiff's rights to
14 equal protection of the laws, in violation of the Fourteenth Amendment to the Constitution
15 of the United States.

16 78. Upon information and belief, and after a reasonable opportunity for
17 discovery, the plaintiff Mr. Roger Sinclair Wright will establish that the defendants stopped,
18 investigated, searched, arrested, and detained/imprisoned plaintiff without reasonable
19 articulable suspicion or probable cause based solely on the Mr. Wright's perceived race and
20 national origin, and no other legitimate fact or circumstances which would have otherwise
21 justified their actions.

22 79. Defendants' unreasonable search and seizure of Mr. Wright and his property
23 was motivated by his perceived race, ethnicity and/or national origin and thus denied
24 Plaintiff his substantive right to equal protection under the laws, including to be free of
25 search, seizure, arrest and detention/imprisonment without reasonable suspicion or probable
26 cause.

1 80. At all relevant times, these Defendants had a duty to not violate the civil
2 rights of Mr. Wright.

3 81. The acts of the defendants caused injury to Mr. Wright. They were
4 intentional and done in knowing violation of the legal and constitutional rights of Mr. Roger
5 Sinclair Wright, without good faith, and with reckless disregard and/or callous indifference
6 to his civil rights.

7 82. Pursuant to 28 U.S.C. § 1331, upon proof of Defendants' violation of his
8 federal constitutional rights Plaintiff is entitled to, and herein seeks, money damages,
9 including compensatory and punitive damages from Defendants.

10 X. PRAYER FOR RELIEF

11 Plaintiff prays for the following relief:

12 1. An award of compensatory and general damages against defendants and each
13 of them, for all damages sustained by plaintiff as a result of Defendants' conduct;

14 2. An award of exemplary and punitive damages against all defendants in an
15 amount commensurate with each Defendant's ability to pay and to deter future conduct;

16 3. Pre-judgment and post-judgment interest, as provided by law;

17 4. An award of attorney fees and costs; and

18 5. For such other and further legal and equitable relief as this Court deems
19 necessary, just, and proper.

20 XI. JURY DEMAND

21 Plaintiff hereby demands a trial by jury to all issues so triable.

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24 DATED this 9th day of July, 2018.

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By Roger Wright
Roger Wright
Plaintiff *Pro Se*